

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEANDRE WATSON, and
LARITA WATSON,

Plaintiffs,

VS.

YASCO TRUCKING, LLC, and
SABAN BULJUBASIC,

Defendants.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

Cause No.

JURY TRIAL DEMANDED

NOTICE OF REMOVAL

COME NOW Defendant, Yasco Trucking, L.L.C., by and through its attorneys Roberts Perryman, P.C., and hereby files its Notice of Removal stating the following:

INTRODUCTION

1. A civil action has been commenced and is now pending in the Circuit Court of Lincoln County, State of Missouri, Case No. 22L6-CC00047, wherein DeAndre Watson and Larita Watson are the Plaintiffs and Yasco Trucking, L.L.C. and Saban Buljubasic, are the Defendants.

2. This action is a civil action wherein Plaintiffs have made claims for damages as a result of Defendants' alleged negligence in connection with a tractor trailer motor vehicle accident that occurred on June 5, 2017.

3. Defendant Saban Buljubasic was a citizen of Washington at all times relevant.

4. Defendant, Yasco Trucking, L.L.C., is a Nebraska limited liability company with its principal place of business in Nebraska. Its sole member is a citizen of Nebraska.

DIVERSITY OF CITIZENSHIP EXISTS

5. This action is a civil action, of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. § 1332 and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441, and this is a civil action proceeding involving diversity of citizenship.

6. Plaintiff DeAndre Watson was and is a citizen of the State of Missouri.

7. Plaintiff Larita Watson was and is a citizen of the State of Missouri.

8. Defendant Yasco Trucking, L.L.C. is a limited liability company with its principal place of business in Nebraska. Its sole member is a citizen of Nebraska.

9. Defendant Saban Buljubasic was a citizen of Washington at the time of the accident and all times relevant. Upon information and belief, Buljubasic is now deceased.

THE AMOUNT IN CONTROVERSY HAS BEEN SATISFIED

10. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs. Plaintiff DeAndre Watson is claiming serious injuries to his head, neck, bilateral shoulders, left upper extremity, cervical and lumbar spine, mid-lower back, and right knee from this accident. Plaintiff further underwent a C5 corpectomy/C4-6 anterior cervical discectomy with fusion surgery with medical bills in excess of \$100,000 and alleged future medical treatment. Plaintiff is also claiming he was unable to work for several weeks following this accident and surgery; therefore, Plaintiff is also making a claim for lost wages. Plaintiff Larita Watson is claiming a loss of consortium with each of their damages over \$75,000.00. Plaintiffs have not agreed to stipulate that their damages are less than \$75,000.00.

NOTICE OF REMOVAL IS TIMELY

11. Less than thirty (30) days have elapsed since receipt of said initial pleadings by Defendant.

12. Defendant files herewith a copy of all process, pleadings, and order it has in this action. *See Exhibit A.*

WHEREFORE Defendant Yasco Trucking, L.L.C., by and through counsel, prays the Court to accept its Notice for Removal, and enter such orders as may be necessary to affect the complete removal of this action from the Circuit Court of Lincoln County, State of Missouri, to the United States District Court for the Eastern District of Missouri, and that further proceedings be discontinued in the State Court and all future proceedings be held in this Court, as the laws in such case provide.

Respectfully submitted,

ROBERTS PERRYMAN P.C.

/s/ Ted L. Perryman

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 29th day of June 2022, copies of the foregoing were served on the following counsel of record via the Court's ECF filing system:

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